UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
NATIONAL VEHICLE AND FUEL EMISSIONS LABORATORY
2565 PLYMOUTH ROAD
ANN ARBOR, MICHIGAN 48105-2498

OFFICE OF
AIR AND RADIATION

October 6, 2003

Dear Manufacturer: CCD-03-12 (LDV/LDT/ICI/LIMO)

Subject: Model Year 2005 Compliance Preview Meeting

EPA is conducting its annual review of your certification, in-use compliance and fuel economy plans for the 2005 model year and would like to meet with you to facilitate the early resolution of any concerns and expedite the certification process. At your convenience, please contact your EPA certification representative to schedule a date for this meeting. Discussion topics will include your compliance plans for the upcoming model year and any new product offerings and/or technologies you may be intending to introduce. Enclosure I contains a detailed list of the topics we would like you to discuss.

As in the past, for our laboratory planning purposes, we are also asking you to submit your projections for EPA confirmatory testing for the remainder of 2003 and the entire 2004 calendar years. Enclosure II is a spreadsheet for you to complete and return to your EPA certification representative.

If you are unable to meet in person with us, please submit a written response to the items contained in Enclosures I and II. If you have already had a 2005 preview meeting with EPA, please schedule another brief meeting (or send a written response) to address or update topics that were not covered in the first meeting.

We look forward to meeting with you.

Sincerely,

Merrylin Zaw-Mon, Director
Certification and Compliance Division
Office of Transportation and Air Quality

Enclosures: Enclosure I - Model Year (MY) 2005 Discussion Topics for the Annual Certification Preview Meeting for Light-Duty and Heavy-Duty Vehicles (chassis dynamometer certified)

Enclosure II - EPA Light-duty& Heavy-duty Chassis Dynamometer Manufacturer Test Request Projections

Enclosure I

Model Year (MY) 2005 Discussion Topics for the Annual Certification Preview Meeting for Light-Duty and Heavy-Duty Vehicles (chassis dynamometer certified)

1. Structure of Your Organization

1.1 Provide an overview of your organization detailing the functions and staff responsible for fuel economy, certification and in-use programs.

2. Product Line Plans

2.1 Detail your product plans for MY 2005 to include information regarding any new technologies, car lines, engines, transmissions, emission controls, fuel economy improvements and/or any other technology that may be introduced.

2.2 Will you certify any new sport utility vehicles, mini-vans, or non-conventional trucks (e.g., passenger-oriented pick-ups with a small cargo bed) that have not been previously certified? Detail your reasoning for certifying any of these as light-duty vehicles, light-duty trucks, or heavy-duty trucks within the definitions contained in 40CFR 1803-01.

3. Certification Issues

3.1 Describe your MY 2005 light-duty vehicles, light-duty trucks, or heavy-duty trucks (chassis dynamometer) testing and certification plans and identify any critical dates related to them. Identify any early MY 2005 certification plans with dates. Provide your EPA certification representative with your Test Waiver Request plans using the table in Enclosure II within three weeks of your preview meeting, or sooner.

3.2 Provide an overview of your certification program for MY 2005. Include a list of Test Groups and Durability Groups. For heavy-duty chassis certified vehicles, provide information about the emission standards to which these vehicles will be certified, including the option, FELs averaging, banking and trading, transferring credits, etc.

3.3 Advise the status of your durability/in-use program. Identify any trends. Provide an overview of the in-use test programs conducted in the past year and provide information concerning programs planned for 2005 and 2006 MY vehicles.

3.4 Summarize your phase-in plans for Tier 2, Interim Non-Tier 2, Clean fuel Vehicle Heavy-duty (chassis certified) vehicles and California LEV-II vehicles.

3.5 Describe any plans to certify alternative fueled vehicles, diesel vehicles, hybrid

and fuel cell vehicles, and new technology (e.g., direct injection) for 2005-2007 model years.
Describe any special testing methods that will be employed.

3.6 Describe your phase-in plans for ORVR indicating what MY 2005 Test Groups/Evap Families will incorporate ORVR.

3.7 Do you have any OBD issues? Do you have any Test Groups that will not require California OBD approval?

3.8 Do you have any NLEV issues? Explain how you will meet the fleet average NMOG emission standards described in 40 CFR 86.1711-99 for 2005 model year vehicles. The MY 2003 annual report is due May 1, 2004. Will you end up with NLEV credits at the end of the year? If not, please explain your plans to purchase credits.

3.9 Please provide an overview of the laboratory equipment which will be used to measure emissions from Tier 2 vehicles and zero evaporative vehicles.

4. Fuel Economy Issues

4.1 Will you have any driver selectable devices or multi-mode transmissions in your product line that have not previously received EPA approval? Please describe how they operate. Are any vehicles equipped with any driver selectable devices that prevent the engagement of certain gears, prevent lock-up, or prevent overdrive operation? If so, does the driver selectable device reset to the enable position after the ignition is turned off?

4.2 Describe the method of operation for any semi-automatic transmissions in your product offering that may be easily operated in either automatic or manual mode. Explain how such vehicles will be tested for fuel economy purposes.

4.3 Discuss any fuel economy labeling or CAFÉ issues.

5. In-use Performance and Compliance Program

5.1 Provide an overview for any in-use testing programs conducted in the past year for MY 1998-2003 vehicles other than for alternative durability and CAP 2000 testing programs. How many vehicles were tested?

5.2 Provide an overview of the process your company uses to submit emission related defect reports to EPA (ref. 40 CFR 85.1901). Describe whom is responsible for submitting these reports to EPA and their time line for doing so. Describe your

process for notifying owners/leasees of recall actions.

5.3 Explain the methods used to track emission related component failures as they occur in the field. Describe how you ensure that EPA is notified of a defect within fifteen (15) days after an emission component has twenty-five (25) warranty claims for the same model year vehicle(s) and/or engine(s).

5.4 Provide an overview of the process your company uses to correct defects after they have been discovered. Discuss the elements involved in redesign, manufacture, distribute replacements to manufacturing, distributors, dealers, etc. Include the method of communicating the corrections and instructions for implementing them to all involved parties.

6. Other Issues

6.1 Discuss any other pertinent information not previously outlined above that may be related to the certification process, in-use compliance and fuel economy.

Enclosure II

EPA Light-duty& Heavy-duty Chassis Dynamometer Mfr. Test Request Projections

MFR: _____

2004 CALENDAR YEAR

Test Procedure:	FTP	SFTP	2-D Evap	SFTP	FTP
Dyno Type:	Twin Roll	Single Roll	Any	Single Roll	Any
Fuel Type:	Gasoline*	Gasoline*	Any	Any	Non-gasoline**
2003					
Oct 1-15					
Oct 16-31					
Nov 1-15					
Nov 16-30					
Dec 1-15					
Dec 16-31					
2004					
Jan 1- 15					
Jan 16-31					
Feb 1- 15					
Feb 16-29					
Mar 1-15					
Mar 16-31					
Apr 1-15					
Apr 16-30					
May 1-15					
May 16-31					
Jun 1-15					
Jun 16-30					
July 1-15					
July 16-31					
Aug 1-15					
Aug 16-31					
Sept 1-15					
Sept 16-30					
Oct 1-15					
Oct 16-31					
Nov 1-15					
Nov 16-30					
Dec 1-15					
Dec 16-31					

*Gasoline includes Indolene and Phase II test fuel

**Please indicate the type of fuel which will be used.